

1 CODE:
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5 Attorney for RAFAEL ALVAREZ

6
7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

Case No. 14-CV-00506

13 \$102,283.44 IN UNITED STATES CURRENCY
SEIZED FROM BANK OF AMERICA
14 ACCOUNT,

15 Defendant.
_____ /

16 **ANSWER TO COMPLAINT FOR FORFEITURE IN REM**

17 COMES NOW, RAFAEL JIMENEZ-ALVAREZ, by and through his attorney, JESSE B.
18 KALTER, ESQ., and answers Plaintiff's Complaint, filed October 1, 2014, as follows:

19 That Mr. Jimenez-Alvarez admits the allegations contained in Paragraphs
20 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,18,19,20 and 21 of Plaintiff's Complaint.

21 The Mr. Jimenez-Alvarez denies each and every allegation contained in Paragraphs 17,22,23
22 and 24 of Plaintiff's Complaint.

23 WHEREFORE, RAFAEL JIMENEZ-ALVAREZ prays for the following relief:

- 24 1. Plaintiff take nothing by virtue of their Complaint filed October 1, 2014, and that all
25 property seized by Plaintiff be immediately returned to Rafael Jimenez-Alvarez.
26 2. For such other relief as the Court deems just and proper.
27 3. For Attorney's fees and costs of defending the lawsuit.

1 DATED this 14 day of November, 2014.
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4 JESSE KALTER LAW, P.C.

5
6  JESSE B. KALTER, ESQ.

Nevada Bar #9846

7 ATTORNEY FOR RAFAEL JIMENEZ-ALVAREZ

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VERIFICATION

STATE OF NEVADA)
) ss.
COUNTY OF CARSON)

I, RAFAEL JIMENEZ-ALVAREZ, being first duly sworn, declare under PENALTY OF PERJURY that the below listed assertions are true, and depose and say that:

I have read the foregoing ANSWER TO COMPLAINT FOR FORFEITURE and know the contents thereof; the same is true and correct as to my own knowledge, except as to those matters therein stated upon information and belief, and as to such matters, I believe them to be true.



RAFAEL JIMENEZ-ALVAREZ

SUBSCRIBED AND SWORN to before
me, by RAFAEL JIMENEZ-ALVAREZ, on this 14
day of November, 2014.





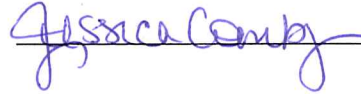
NOTARY PUBLIC

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of JESSE KALTER LAW, P.C., and that on this date I deposited for mailing, by first class mail, at Sparks, Nevada, a true copy of the foregoing document to:

United States Attorney
ATTN: Greg Addington, Esq.
100 W. Liberty Street, Ste 600
Reno, NV 89501

DATED this 14 day of November, 2014.

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